

**Regional Water Quality Control Board  
Central Valley Region**

**Board Meeting – 7/8 June 2012**

**Response to Written Comments on  
Tentative Waste Discharge Requirements for**

**Shasta-Tehama-Trinity Joint Community College District,  
Shasta College Wastewater Treatment Facility**

**7 May 2012**

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At a public hearing scheduled for 7/8 June 2012, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements for the Shasta-Tehama-Trinity Joint Community College District, Shasta College Wastewater Treatment Facility. This document contains responses to written comments received from interested parties in response to the Tentative Order. Written comments from interested parties were required to be received by the Central Valley Water Board by 03 May 2012 in order to receive full consideration. Comments were received prior to the deadline from:

1. Central Valley Clean Water Association (CVCWA) (received 3 May 2012)

Written comments from the above interested parties are summarized below, followed by the response of Central Valley Water Board staff.

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**U.S. EPA COMMENTS**

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**CVCWA – COMMENT #1:**

**The Tentative Order includes groundwater limitations for chloride, electrical conductivity (EC), and total dissolved solids (TDS) based on agricultural production protection values derived from *Water Quality for Agriculture* by Ayers and Westcot, Food and Agriculture Organization of the United Nations (1985) (UN Report). CVCWA believes the proposed values are inappropriate for this facility and should be based on a thorough consideration of site-specific conditions.**

**RESPONSE:**

Central Valley Water Board staff concurs that the groundwater limits should be adjusted. The proposed limits for chloride, EC, and TDS were based on the Ayers and Westcot report to protect salt-sensitive crops. Strawberries are a salt-sensitive crop grown in the vicinity of the discharge using groundwater supply. In Order WQO-2004-0010, the State Water Resources Control Board addressed the direct application of the Ayers and Westcot values stating that the values given in the report cannot be interpreted as absolute values. The Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) is a collaborative basin planning effort aimed at developing

and implementing a comprehensive salinity and nitrate management program. One of the goals of CV-SALTS is to develop a methodology for determining the appropriate salinity objectives for the protection of agricultural beneficial uses. The proposed permit has been revised to implement groundwater limits protective of the MUN beneficial use, directs the discharger to work with CV-SALTS in establishing appropriate objectives for protection of agricultural beneficial uses, and directs the discharger to prepare and implement a salinity minimization program. The proposed permit has also been revised to include a reopener provision to allow the groundwater limits to be updated in the future as appropriate, based on new information.